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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**UNITED STATES OF AMERICA**

**v.**

**JAMES VELISSARIS,**

**Defendant.**

**No. 1:22-cr-00105-DLC**

**Hon. Denise L. Cote**

**DEFENDANT'S APPLICATION TO  
FILE EXHIBITS UNDER SEAL**

The Defendant, James Velissaris (“Mr. Velissaris” or “Defendant”), by and through his undersigned counsel, respectfully files this application to file Exhibits A and B to his Reply Memorandum of Law in Support of his Motion to Withdraw his Guilty Plea under seal. Exhibit A contains Mr. Velissaris’ plea agreement with the government dated November 20, 2022. Exhibit B contains highly sensitive information regarding the circumstances surrounding Mr. Velissaris’ guilty plea. Sealing this document will protect the sensitivity of the information and the identities of the third parties involved.

For these reasons, Mr. Velissaris respectfully requests that the Court grant his application to file Exhibits A and B to his Reply under seal.

Dated: April 5, 2023

The defendant shall immediately email the documents to the Court's Chambers and to the Government. No decision to seal can be made without seeing the documents.

*Michael A. Battle  
April 6, 2023*

Respectfully submitted,

/s/ Michael A. Battle

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